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American Income Life Insurance Company
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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10 SUSAN MULLIN,

11 Plaintiff,

12 vs.

13 AMERICAN INCOME LIFE INSURANCE
14 COMPANY,

15 Defendants.
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Case No. 17-cv-05223-RS

(Honorable Richard Seeborg)

**STIPULATION TO EXTEND
DATES SET FORTH IN THE
COURT'S SCHEDULING
ORDER; ~~[PROPOSED]~~ ORDER**
AS MODIFIED BY THE COURT

Complaint Filed: September 8, 2017
Discovery C/O: March 7, 2019
Motion Hrng. C/O: May 9, 2019
Pretrial Conf.: June 26, 2019
Trial: July 8, 2019

STIPULATION TO EXTEND DATES
& [PROPOSED] ORDER
Case No. 17-cv-05223-RS
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WHEREAS, the dispositive motion hearing cutoff is currently May 9, 2019, the pretrial conference is set for June 26, 2019 and trial is set for July 8, 2019; and

WHEREAS, the parties have commenced settlement discussions and wish to continue those discussions, possibly in the context of a mediation session, without the need to file dispositive motions in time to comply with the May 9, 2019 motion hearing cutoff, and without the need to conduct the remaining deposition in Texas;

The parties agree to request that the Court amend the Scheduling Order to permit the taking of the Texas deposition not later than May 24, 2019, and to extend the dispositive motion hearing cutoff date to June 27, 2019; and, the parties agree to request that the Court continue the pretrial conference to August 14, 2019 and the trial to August 26, 2019, or such dates as are convenient with the Court's calendar.

IT IS SO STIPULATED.

1 DATED: March 20, 2019

HINSHAW & CULBERTSON LLP

3 By: /s/ Royal F. Oakes

4 ROYAL F. OAKES

MICHAEL A.S. NEWMAN

Attorneys for Defendant

American Income Life Insurance
Company

8 DATED: March 20, 2019

KANTOR & KANTOR, LLP

10 By: /s/ Glenn R. Kantor

11 GLENN R. KANTOR

ALAN E. KASSAN

ANDREW M. KANTOR

Attorneys for Plaintiff

Susan Mullin

15 *Filer's attestation: Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures,*
16 *Royal F. Oakes hereby attests that concurrence in the filing of this document and its*
17 *contents has been obtained by all signatories listed.*

~~PROPOSED~~ ORDER

Having reviewed the Parties' Stipulation to Extend the Dates Set Forth in the Court's Scheduling Order, and for good cause shown, IT IS HEREBY ORDERED THAT:

- The Scheduling Order is amended to reflect a deadline to conduct the Texas deposition ^{by} ~~of~~ May 24, 2019 [proposed May 24, 2019].
- The Scheduling Order is amended to reflect a dispositive motion hearing cutoff date of June 27, 2019 [proposed June 27, 2019].
- The Scheduling Order is amended to reflect a pretrial conference date of August 14, 2019 [proposed August 14, 2019].
- The Scheduling Order is amended to reflect a trial date of August 26, 2019 [proposed August 26, 2019].

IT IS SO ORDERED.

DATED: 3/21, 2019



HONORABLE RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE